

October 8, 2008

Anthony Petrucelli, Chair
Westfield Planning Board
City Hall
59 Court Street
Westfield, MA 01085

Reference: Commonwealth Guardrail, 132 Apremont Way, Westfield

Dear Mr. Petrucelli:

I am writing you on behalf of the Barnes Aquifer Protection Advisory Committee (BAPAC) to provide our comments regarding the Special Permit application for a 10,000 above ground storage tank for diesel fuel at Commonwealth Guardrail, 132 Apremont Way. Kelly Egan and Dan Lemelin from Lemelin Environmental Services, Inc. of Chicopee attended BAPAC's October 7, 2008 meeting. BAPAC is composed of representatives from the four jurisdictions in which the Barnes Aquifer is located. The committee was created in 1989 to address developments of regional impact that are proposed within the aquifer to ensure that drinking water resources remain safe for the more-than 60,000 people that it serves.

Mr. Lemelin explained the concrete containment pad and positive limited barrier within it that is used industry wide for the containment of small spills. However, Mr. Lemelin did explain that maintenance of the concrete pad is absolutely critical to keeping the pad clean so that during storm events, any fuel "drips" do not get flushed off the pad and washed away with stormwater. It is important to note that the fueling pad is not proposed to be covered which increases its likelihood of being inundated by rain and snow. However, the overall site design relative to any existing or proposed stormwater infrastructure still remains unclear. Mr. Lemelin noted that most of the site is crushed stone except for some buildings and that there isn't any obviously apparent stormwater drains, etc.

Therefore, BAPAC reiterates its previous comment encouraging the Board to evaluate the location of the tank in relation to existing, or proposed, stormwater management structures such as catchbasins, leaching cells, swales, infiltration trenches, etc. to ensure that any failure of the tank or the flusing of the concrete pad, is not going to drain directly into one of these structures. In the absence of any stormwater treatment devices, it would appear that all stormwater, contaminated or otherwise, would directly infiltrate. Despite the fact that BAPAC is satisfied with the design of the above ground fuel storage tank, the remainder of the site does not appear to comply with other provisions for aquifer protection. Given the high threat for contamination that the site poses without a closed loop stormwater treatment system, BAPAC does not endorse locating a fuel storage tank at this facility. Thank you for the opportunity to comment.

Sincerely,

Michael Czerwiec, Vice-Chair

CC: Lemelin Environmental Services, Inc. 70 North Street, Chicopee, MA 01020